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10 Attorneys for Defendant
11 ISLAND HOSPITALITY MANAGEMENT III,
12 LLC

13 [Additional counsel on following page]

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16
17 TERESA GARCIA, an individual, on
18 behalf of herself and others similarly
19 situated,

20 Plaintiff,

21 v.

22 ISLAND HOSPITALITY
23 MANAGEMENT III, LLC, a Delaware
24 corporation; and, DOES 1 through 50,
25 inclusive,

26 Defendants.

27 CLASS ACTION

28 Case No. 8:24-cv-00583-DOC-ADS

**PLAINTIFF TERESA GARCIA
AND DEFENDANT ISLAND
HOSPITALITY MANAGEMENT
III, LLC'S NOTICE OF JOINT
MOTION FOR FINAL APPROVAL
OF CLASS ACTION
SETTLEMENT**

Date: December 9, 2024
Time: 8:30 a.m.
Crtrm: 10A

Complaint Filed: September 6, 2023

1 Jose R. Garay (SBN 200494)
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5 Attorneys for Plaintiff, Theresa Garcia, an individual
on behalf of herself and others similarly situated

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1 **TO THE UNITED STATES DISTRICT COURT FOR THE CENTRAL**
2 **DISTRICT OF CALIFORNIA:**

3 **PLEASE TAKE NOTICE** that on December 9, 2024, at 8:30 a.m., in Courtroom
4 10A of the United States District Court for the Central District of California, 411 West
5 Fourth Street, Courtroom 10A, Santa Ana, California 92701, Plaintiff Teresa Garcia
6 (“Plaintiff”) and Defendant Island Hospitality Management III, LLC (“Defendant”)
7 (collectively, the “Parties”) will and hereby do move this Court for entry of an Order,
8 pursuant to Fed. R. Civ. Proc. 23(e), for final approval of the previously-filed Joint
9 Stipulation of Class Action Settlement and Release of Claims (“Settlement”), whereby
10 this Court would:

11 (1) Finally approve the Settlement as fair, reasonable, and adequate under Fed.
12 R. Civ. Proc. 23(e);

13 (2) Finally certify the Settlement Class, as defined in the Settlement, for
14 purposes of settlement only;

15 (3) Appoint Jose Garay of Garay Law, APLC as Class Counsel;

16 (4) Appoint Plaintiff as the Class Representative;

17 (5) Appoint Phoenix Class Action Administrative Solutions as the Settlement
18 Administrator; and

19 (6) Enter final judgment in the form of the [Proposed] Final Approval Order
20 filed herewith.

21 This Motion For Final Approval Of Class Action Settlement is based on this
22 Notice of Joint Motion and Motion, the supporting Memorandum of Points and
23 Authorities, the accompanying Declarations of Jose Garay, Michael Afar, and Taylor
24 Mitzner, the [Proposed] Order and Entry of Judgment, any argument of counsel, and all
25 papers and records on file in this matter.

1 **SIGNATURE ATTESTATION**

2 Pursuant to Local Rule 5-4.3.4(a)(2), the electronic filer below hereby attests that
3 all other signatories listed, and on whose behalf the filing is submitted, concur in the
4 filing's content and have authorized the filing.

5
6 DATED: November 8, 2024

GARAY LAW, APLC

7
8 By: /s/ Jose Garay
9 Jose Garay

10 Attorneys for Plaintiff, the Class
11 Representative, and Settlement Class

12 DATED: November 8, 2024

SEYFARTH SHAW LLP

13 By: /s/ Miguel A. Ramirez
14 Brian T. Ashe
15 Michael Afar
16 Bailey K. Bifoss
17 Miguel A. Ramirez

18
19 Attorneys for Defendant
20 ISLAND HOSPITALITY MANAGEMENT
21 III, LLC